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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DAVID AND NATASHA WIT, *et al.*,

Plaintiffs,

v.

UNITED BEHAVIORAL HEALTH
(operating as OPTUMHEALTH
BEHAVIORAL SOLUTIONS),

Defendant.

Case No. 3:14-CV-02346-JCS

**DECLARATION OF CAROLINE E. REYNOLDS
IN SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION FOR LEAVE TO
SUBMIT NEWLY-DISCOVERED EVIDENCE IN
SUPPORT OF MOTION FOR REMEDIES**

GARY ALEXANDER, *et al.*,

Plaintiffs,

v.

UNITED BEHAVIORAL HEALTH
(operating as OPTUMHEALTH
BEHAVIORAL SOLUTIONS),

Defendant.

Case No. 3:14-CV-05337-JCS

Hon. Joseph C. Spero
Courtroom: G

1 I, CAROLINE E. REYNOLDS, declare and state as follows:

2 1. I am an attorney with the law firm of Zuckerman Spaeder LLP, counsel for
3 Plaintiffs (“Plaintiffs”) in the above-captioned actions. I make this declaration in support of
4 Plaintiffs’ Administrative Motion for Leave to Submit Newly-Discovered Evidence in Support
5 of Motion for Remedies (the “Motion”). I have personal knowledge of the matters stated in this
6 declaration, and I could and would testify competently about them if called upon to do so.

7 2. Plaintiffs submitted their Opening Remedies Brief in this matter on May 3, 2019.
8 *See Wit Dkt. No. 426.* Defendant UBH submitted its Response to Plaintiffs’ Remedies Brief on
9 June 14, 2019. *See Wit Dkt. No. 429.* Plaintiffs submitted their Reply in support of their
10 Remedies Brief on July 10, 2019. *See Wit Dkt. No. 435.*

11 3. In or about November 2019, Plaintiffs’ counsel learned about the evidence
12 described in their Motion.

13 4. On Friday, November 15, 2019, I sent an email to Jennifer Romano, counsel for
14 UBH, to inquire whether UBH would agree to stipulate to Plaintiffs’ submission of the newly-
15 discovered evidence. Ms. Romano responded by email and asked to confer by telephone on
16 Monday, November 18, 2019.

17 5. I conferred with Ms. Romano by telephone on November 18, 2019. At Ms.
18 Romano’s request, following the call, I sent her the Cattaneo Declaration and exhibits by email.

19 6. On November 18, 2019, Ms. Romano advised that UBH is not willing to stipulate
20 to the submission of the additional evidence.

21
22 I declare under penalty of perjury under the laws of the United States that the foregoing is true
23 and correct.

24
25 Executed this 18th day of November, 2019, in Washington, D.C.

26
27 /s/ Caroline E. Reynolds
28 Caroline E. Reynolds